

ELEANOR M. ATTWOOD EMATTWOOD@LAW-LLC.COM 470-823-4000 | LAW-LLC.COM Decatur Two Town Center 125 Clairemont Avenue, Suite 380 Decatur, Georgia 30030

August 27, 2020

NOTICE OF CLAIMS PURSUANT TO O.C.G.A. § 36-33-5

BY CERTIFIED MAIL AND EMAIL: ed.densmore@johncreekga.gov RETURN RECEIPT REQUESTED

Ed Densmore City Manager 11360 Lakefield Drive Johns Creek, GA 30097

Re: Paulette Thompson

Dear Mr. Densmore:

I represent Paulette Thompson with regard to her claims against the City of Johns Creek.

My client will assert state law tort claims of assault, intentional infliction of emotional distress, and negligent supervision/retention against Chris Byers and/or the City. Additionally, we will assert federal law claims under the Equal Protection Clause and Title VII against the City. The purpose of this letter is to notify you of these claims.

TIME AND LOCATION OF THE OCCURRENCE AND ACTS OR OMISSIONS CAUSING THE LOSS

Over the past several years, Chris Byers, sexually harassed and intimidated my client. The City had actual or constructive knowledge of Byers's misconduct but failed to take corrective action affording him the opportunity to continue his sexual harassment towards my client.

NATURE OF THE LOSS SUFFERED AND MONETARY DAMAGES

As a result of his misconduct and the City's failure to take corrective action, my client has suffered emotional distress for which she is entitled to compensatory and punitive damages. Overall, my client has suffered substantial damages because of the actions of the Defendants estimated to be at least \$650,000.



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This letter constitutes notice in accordance with O.C.G.A. §§ 36-33-5.

Yours very truly,

Eleanor Mixon Attwood